

**Exhibit B**

**Mailloux Declaration**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re: )  
COMPUTE NORTH HOLDINGS, INC., *et al.*,<sup>1</sup> ) Chapter 11  
Debtors. )  
 ) Case No. 22-90273 (MI)  
 ) (Joint Administration Requested)  
 )

**DECLARATION OF KATE MAILLOUX  
IN SUPPORT OF DEBTORS' EMERGENCY  
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING  
THE EMPLOYMENT AND RETENTION OF EPIQ CORPORATE  
RESTRUCTURING, LLC AS CLAIMS, NOTICING, AND SOLICITATION AGENT**

I, Kate Mailloux, under penalty of perjury, declare as follows:

1. I am a Senior Director of Epiq Corporate Restructuring, LLC (“Epiq”), a chapter 11 administrative services firm, whose headquarters are located at 777 Third Avenue, 12th Floor, New York, New York 10017. Except as otherwise noted in this declaration (this “Declaration”), I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently as follows.

2. I submit this Declaration in support of the *Debtors' Emergency Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing, and Solicitation Agent* (the "Application"),<sup>2</sup> filed

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397); CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190); CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639); Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors' service address for the purposes of these chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed in the Application.

contemporaneously herewith by the above-captioned debtors and debtors in possession (collectively, the “Debtors”).

3. Epiq represents the following:

- (a) Epiq, its members, and employees are not and were not, within two years before the date of the filing of these chapter 11 cases, creditors, equity security holders, insiders, or employees of the Debtors;
- (b) Epiq will not consider itself employed by the United States government and shall not seek any compensation from the United States government in its capacity as the Claims and Noticing Agent in these chapter 11 cases;
- (c) by accepting employment in these chapter 11 cases, Epiq waives any rights to receive compensation from the United States government in connection with these chapter 11 cases;
- (d) in its capacity as the Claims and Noticing Agent in these chapter 11 cases, Epiq will not be an agent of the United States and will not act on behalf of the United States;
- (e) Epiq will not employ any past or present employees of the Debtors in connection with its work as the Claims and Noticing Agent in these chapter 11 cases;
- (f) Epiq is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code with respect to the matters upon which it is engaged;
- (g) in its capacity as Claims and Noticing Agent in these chapter 11 cases, Epiq will not intentionally misrepresent any fact to any person;
- (h) Epiq shall be under the supervision and control of the Clerk of the United States Bankruptcy Court for the Southern District of Texas (the “Clerk”) with respect to the receipt and recordation of claims and claim transfers;
- (i) Epiq will comply with all requests of the Clerk and the guidelines promulgated by the Judicial Conference of the United States for the implementation of 28 U.S.C. § 156(c); and
- (j) none of the services provided by Epiq as Claims and Noticing Agent in these chapter 11 cases shall be at the expense of the Clerk.

4. I caused to be submitted for review by our conflicts system the names of all known potential parties in interest (the “Potential Parties in Interest”) in these chapter 11 cases. The results of the conflict check were compiled and reviewed by Epiq professionals under my

supervision. Epiq is not aware of any connection that would present a disqualifying conflict of interest. Should Epiq discover any new relevant facts or connections bearing on the matters described herein during the period of its retention, Epiq will use reasonable efforts to promptly file a supplemental declaration.

5. To the best of my knowledge, neither Epiq, nor any of its professionals, has any materially adverse connection to the Debtors, their creditors, or other relevant parties. Epiq may have relationships with certain of the Debtors' creditors as vendors or in connection with cases in which Epiq serves or has served in a neutral capacity as claims and noticing agent and/or administrative advisor for another chapter 11 debtor.

6. Epiq discloses the following connections, each of which Epiq believes does not present an interest adverse to the Debtors:

- AFCO
- AT & T MOBILITY
- BITMAIN
- CNA INSURANCE
- DHL EXPRESS USA INC
- EBAY
- ERNST & YOUNG LLP
- FEDEX
- FIDELITY
- GARTNER
- GRAINGER
- GRASSROOTS
- HDR ENGINEERING, INC.
- HIRE RIGHT
- INSPERITY
- JEFFERIES
- KIRKLAND & ELLIS LLP
- MAXIM CRANE WORKS
- NAVITAS
- OGLETREE DEAKINS NASH SMOAK & STEWART
- PENNZOIL-QUAKER STATE COMPANY
- REPUBLIC SERVICES
- STATE OF CONNECTICUT

- STATE OF DELAWARE
- UPS SUPPLY CHAIN SOLUTIONS, INC.
- VERIZON

7. I believe that Epiq is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: September 22, 2022

*/s/ Kate Mailloux*

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Kate Mailloux  
Senior Director  
Epiq Corporate Restructuring, LLC  
777 Third Avenue, 12th Floor  
New York, New York 10017